

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

§

VS

§

NO. SA: 18-CR-00435-XR-3

§

BRANDON MORRIS

§

§

DEFENDANT'S MOTION FOR BOND

TO THE HONORABLE UNITED STATES DISTRICT JUDGE, WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

COMES NOW BRANDON MORRIS, Defendant in the above-entitled and numbered cause, by and through his attorney, files this Motion for Bond in the above-entitled and numbered cause and in support hereof, Defendant would show the following, to wit:

I.

Mr. Morris is currently detained at the Karnes County Detention and is scheduled for docket call on April 15, 2021 and for trial on April 24, 2021.

II.

On June 14, 2018 the defendant waived his detention hearing on the advice of counsel and has been held without bond. The defendant has been held for approximately two (2) years and nine (9) months without trial or conviction in violation of his constitutional rights to due process. The effects of the COVID-19 pandemic have put the Defendant for further prolonged pretrial incarceration.

III.

The Defendant respectfully request to be released on bond to prevent undue, coercive, and oppressive incarceration prior to trial; to minimize anxiety and concern accompanying public

accusation; and to limit the possibilities that long delay will impair the ability of an accused to defend himself.

If the Defendant cannot be immediately released on bond then the defendant respectfully requests his detention hearing be reopened in accordance with *Unites States v Clark*, 865 F.2d 1433, 1437 (4th Cir 1989).

IV.

Mr. Morris respectfully request that he be released on bond under such conditions as will reasonably assure his appearance as required and will assure the safety of any other person of the community.

WHEREFORE, premise considered, the Defendant respectfully request that his bond hearing be reopened and the he be granted bond while awaiting trial.

Respectfully Submitted,

LAW OFFICES OF ALAN BROWN
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/S/

ALAN BROWN
BAR NO. 03090000

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of March 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

U.S. Attorney's Office
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

_____/S/
ALAN BROWN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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ORDER

On this date came to be considered Defendant's Motion for Bond. After consideration of same, the Court is of this opinion that said Motion is hereby:

GRANTED DENIED

IT IS HEREBY FURTHER ORDERED THAT: _____

_____.

SIGNED and ENTERED on this the _____ day of _____, 2021.

U.S. DISTRICT JUDGE